

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:21-cv-422-WO-JLW**

BLUE FORCE TECHNOLOGIES INC.,)
)
Plaintiff/Counterclaim Defendant,)
)
v.)
)
BETA TECHNOLOGIES, INC.,)
)
Defendant/Counterclaim Plaintiff.)
)

SIXTH DECLARATION OF DR. DAVID CHURCHILL

David Churchill states the following:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The information set forth in this Declaration is based on my personal knowledge.
2. I submit this Declaration in support of BETA Technologies, Inc.’s (“BETA”) Motion for Protective Order.
3. I joined BETA in December 2017 and serve as its Chief Technology Officer. In that role, I have knowledge about BETA’s design, development, and engineering work on its ALIA aircraft and related documents and information in BETA’s possession.
4. I have reviewed Exhibit 2 to BETA’s Memorandum in Support of its Motion for Protective Order, which is an email dated June 30, 2021, from Kyle Clark (CEO of BETA) to Nick Wilson (who then provided support to Blue Force as an independent

consultant and is now a BETA employee). In this email, Mr. Clark asked Mr. Wilson to provide BETA with intellectual property that was owned by BETA. To the best of my knowledge, Mr. Wilson did not provide BETA with any documents or information in response to Mr. Clark's request. As a result, BETA was forced to seek the intellectual property at issue by moving the Court for a Temporary Restraining Order, which the Court treated as a request for a mandatory injunction and granted.

5. I understand that Blue Force contends that Mr. Wilson shared confidential Blue Force documents with BETA, possibly at BETA's request. That is not true. For the avoidance of doubt, Mr. Wilson has not shared any confidential Blue Force documents or information with BETA, except to the extent that he has responded to subpoenas issued to him in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/9/2022 _____

DocuSigned by:
David Churchill
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David Churchill